

# Exhibit B

ATTORNEYS' EYES ONLY

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J. Geier

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

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CHIRMAR SYSTEMS, INC., d/b/a  
CMS TECHNOLOGIES AND CHIRMAR  
HOLDINGS COMPANY, LLC,

Plaintiffs,

CASE NO.

v.

6:15-cv-618-JRG-JDL

ADTRAN, INC., et al.,

Defendants.

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V. HUAWEI TECHNOLOGIES USA,  
INC. et al.,

6:15-cv-643-JDL

(CONSOLIDATED)

DEPOSITION OF JAMES GEIER

Englewood, Ohio

Thursday, November 3, 2016

\*\*\* ATTORNEY'S EYES ONLY \*\*\*

Reported by:

DEBORAH C. FUREY, RPR, CLR, CRI

JOB NO. 115015

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<p>1 J. Geier</p> <p>2 would still be no infringement. So if you don't</p> <p>3 mind I'll look at my report to refresh my memory.</p> <p>4 Q. Well, I just want to focus on the one</p> <p>5 statement you said, is that the path won't</p> <p>6 be coupled across until the PSE applies the</p> <p>7 detection voltage, is that right?</p> <p>8 MR. STEINBERG: Objection. Form.</p> <p>9 Q. Even when it's sold you said there's no</p> <p>10 path coupled across.</p> <p>11 MR. STEINBERG: Objection. Form.</p> <p>12 THE WITNESS: I'm saying that when it's</p> <p>13 sold there is no path coupled across. I did</p> <p>14 testing that proved that using a multimeter</p> <p>15 and I saw no path, there was an open circuit.</p> <p>16 When you connect the PSE through a cable</p> <p>17 to a PD, the PSE applies a voltage, a</p> <p>18 detection voltage, and that causes a certain</p> <p>19 current to flow back, and it looks at the</p> <p>20 current level and determines whether or not it</p> <p>21 passes detection.</p> <p>22 Q. Is there a path in the PD when the PSE</p> <p>23 applies the detection voltage?</p> <p>24 MR. STEINBERG: Objection. Form.</p> <p>25 THE WITNESS: What there is -- there's</p>	<p>1 J. Geier</p> <p>2 an impedance that's imposed, that is resulting</p> <p>3 from putting a voltage there that triggers</p> <p>4 something in the chip, which Dr. Madisetti</p> <p>5 hasn't really shown or analyzed. But there is</p> <p>6 a mechanism where it causes a certain current</p> <p>7 to flow, and then the PSE can then use that</p> <p>8 information to determine whether or not it's a</p> <p>9 valid PD.</p> <p>10 Q. A PSE applies the detection voltage,</p> <p>11 correct?</p> <p>12 MR. STEINBERG: Objection. Form.</p> <p>13 THE WITNESS: The PSE is the one that</p> <p>14 initiates it by providing the voltage for</p> <p>15 detection purposes, right.</p> <p>16 Q. And in response to that detection</p> <p>17 voltage, a PD presents a detection signature,</p> <p>18 correct?</p> <p>19 MR. STEINBERG: Objection. Form.</p> <p>20 THE WITNESS: The PD doesn't necessarily</p> <p>21 do that. There's a current that flows that</p> <p>22 the PSE can read, it can see the current, you</p> <p>23 know, that's flowing because of that.</p> <p>24 Q. The current flows through the PD, right?</p> <p>25 A. The current flows through the cable,</p>
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<p>1 J. Geier</p> <p>2 through the PD, and back to the PSE, which is</p> <p>3 where the PSE then uses that information as part</p> <p>4 of the detection protocol.</p> <p>5 Q. In that current flows through a PD</p> <p>6 through an approximately 25 kilohm resister,</p> <p>7 correct?</p> <p>8 MR. STEINBERG: Objection to form.</p> <p>9 THE WITNESS: I don't necessarily -- I'm</p> <p>10 not quite -- I don't necessarily -- it's not</p> <p>11 like there's a resistor that is just switched</p> <p>12 in, there's an impedance that's presented,</p> <p>13 that provides a certain current that the PSE</p> <p>14 can read.</p> <p>15 Q. The current flows through the PD,</p> <p>16 correct?</p> <p>17 A. I think I already answered that. It</p> <p>18 flows through the cable -- from the PSE through</p> <p>19 the cable, through the PD, and back to the PSE.</p> <p>20 Q. So for current to flow through the PD,</p> <p>21 that PSE must have a path, correct?</p> <p>22 MR. STEINBERG: Objection to form.</p> <p>23 THE WITNESS: It has a value of</p> <p>24 impedance that's low enough to cause current</p> <p>25 flow.</p>	<p>1 J. Geier</p> <p>2 Q. Can the current flow through the PD if</p> <p>3 there is no path?</p> <p>4 MR. STEINBERG: Objection to form.</p> <p>5 THE WITNESS: If it's an open circuit,</p> <p>6 there would be no current flow. I showed that</p> <p>7 with my testing. There's no path, as far</p> <p>8 as the way the standard -- or I'm sorry -- the</p> <p>9 way the specification indicates path. There's</p> <p>10 no path if there's an open circuit, and</p> <p>11 because of the open circuit, there's no</p> <p>12 current flow.</p> <p>13 Q. What's the voltage your multimeter</p> <p>14 applied?</p> <p>15 A. It's a very low voltage, much less than</p> <p>16 what these detection voltages are. It would say</p> <p>17 it's very likely in the millivolts.</p> <p>18 Q. How much current does it provide?</p> <p>19 A. Very small amount, probably in the micro</p> <p>20 amps. I know this mostly from going back into my</p> <p>21 earlier days of working with multimeters and</p> <p>22 understanding how they worked.</p> <p>23 (Exhibit 3 Geier, Linear</p> <p>24 Technology, Power over Ethernet,</p> <p>25 IEEE 802.3af PD Interface, Bates</p>